

STATE OF SOUTH CAROLINA

(Caption of Case)

In re:

Application of Palmetto State Utility Services, Inc.  
For Certificate of Public Convenience and Necessity  
to provide Water and Sewerage Services

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 356 - WS

(Please type or print)

Submitted by: Marcus A. Manos

SC Bar Number: 011876

Address: Nexsen Pruet, LLC

Telephone: 803-253-8275

P.O. Drawer 2426

Fax: 803-727-1467

Columbia, SC 29202

Other: \_\_\_\_\_

Email: mmanos@nexsenpruet.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☒ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigatio
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input checked="" type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input checked="" type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

# NEXSEN PRUET

**Marcus A. Manos**  
Member  
Admitted in SC, NC, DC

January 28, 2008

**VIA HAND DELIVERY**

Charles L.A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
Synergy Office Park  
101 Executive Center Drive  
Columbia, South Carolina 29211

RECEIVED  
2008 JAN 28 PM 1:27  
SC PUBLIC SERVICE  
COMMISSION

**Re: Application of Palmetto State Utility Services, Inc. for Certificate  
of Public Convenience and Necessity / Docket No. 2007-356-WS**

Dear Mr. Terreni:

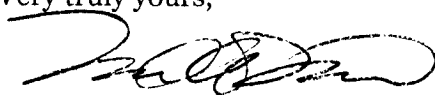
Enclosed for filing with the Public Service Commission is an original and eleven copies of the Motion For Pro Hac Vice Admission of Justin M. Ganderson in the above referenced matter. Please return a clocked-in copy to me via our courier.

By copy of this letter and as evidenced by the attached Certificate Of Service we are serving the Office of Regulatory Staff with copies of the above Motion.

Thank you for your assistance in this matter.

With best regards, I am

Very truly yours,



Marcus A. Manos

MAM/hjr  
Enclosure  
cc w/encl.: Shealy Boland Reibold, Esquire

1230 Main Street  
Suite 700 (29201)  
PO Drawer 2426  
Columbia, SC 29202  
www.nexsenpruet.com

T 803.253.8275  
F 803.727.1467  
E MManos@nexsenpruet.com  
Nexsen Pruet Adams Kleemeier, LLC  
**Attorneys and Counselors at Law**

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**

**Docket No. 2007-356-WS**

RECEIVED  
2008 JAN 28 PM 4:27  
SC PUBLIC SERVICE  
COMMISSION

IN RE:	)	
	)	
Application of Palmetto State Utility	)	<b>MOTION FOR PRO HAC VICE</b>
Services, Inc. for Certificate of	)	<b>ADMISSION</b>
Public Convenience and Necessity	)	
	)	
	)	

COMES NOW Palmetto State Utility Services, Inc. ("PSUS"), by and through its undersigned counsel and pursuant to LR83.1(d), and hereby moves the Court to allow the special appearance of Justin Mann Ganderson, Esquire of the law firm of McKenna Long & Aldridge LLP, as co-counsel on behalf of PSUS in this action. In support thereof, PSUS respectfully shows unto the Commission as follows:

1. Justin Mann Ganderson is a member in the law firm of McKenna Long & Aldridge LLP in Washington, DC. Mr. Ganderson has been a member of the Virginia Bar since October 2005; he is currently a member in good standing of the Supreme Court of Virginia. In addition, Mr. Ganderson received notice on January 4, 2008 from the District of Columbia Court of Appeals that the Committee on Admissions has certified his admission to the Bar of the District of Columbia Court of Appeals. Mr. Ganderson is scheduled to be administered the oath of admission on February 8, 2008.

2. Mr. Ganderson will appear in this matter in association with Marcus A. Manos, an attorney duly authorized to practice law before this Commission.

3. Mr. Ganderson agrees to be responsible for ensuring the presence of an attorney who is familiar with the case and has authority to control the litigation at all conferences, hearings, trials, and other proceedings.

WHEREFORE, Palmetto State Utility Services, Inc. respectfully prays that its Motion requesting the Commission to permit the special appearance of Justin M. Ganderson as co-counsel in this action be allowed.

This the 28<sup>th</sup> day of January, 2008.



Marcus A. Manos  
S.C. State Bar No. 011876  
NEXSEN PRUET, LLC  
1230 Main Street, Suite 700  
Post Office Drawer 2426  
Columbia, South Carolina 29201  
Phone: 803.253.8275  
Facsimile: 803.727.1467  
MManos@nexsenpruet.com

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

In re Application of  
Palmetto State Utility Services, Inc.  
for Certificate of Public Convenience and Necessity  
Plaintiff

2007-356-WS  
Docket No.

The Public Service Commission  
of South Carolina  
Court

Mailing Address of Court: Synergy Office Park,  
101 Executive Center Drive  
Post Office Drawer 11649  
Columbia, South Carolina 29211

**RECEIVED**

JAN 24 2008

Comes now Justin Mann Ganderson, applicant herein, and respectfully represents the following:

1. Applicant resides at 1101 New Hampshire Avenue, NW, Apt. 119  
Street Address

Washington,  
City  
202-680-4737,  
Telephone

County

DC  
State

20037 S.C. SUPREME COURT  
Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

McKenna Long & Aldridge LLP, with offices at, 1900 K Street, NW

Street Address

Washington,  
City  
202-496-7226,  
Telephone

County

DC,  
State

20006  
Zip Code

202-496-7756  
Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by  
Palmetto States Utility Services, Inc. to provide legal representation in connection with the above case now  
pending before the above named court of the State of South Carolina.

4. Since October of 2005, applicant has been, and presently is, a member in good standing of the bar  
of the highest court of the District of Columbia or the State of Virginia where applicant regularly practices law.  
Attached is a copy of a certificate of good standing. Applicant will provide the original certificate prior to the hearing  
before the Public Service Commission; Applicant has not received the original certificate from the Supreme Court of  
Virginia.

Note, Applicant has applied to become a member of the District of Columbia Bar, and is awaiting approval of  
such application.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts  
applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the  
Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Supreme Court of Virginia	October 2005
United States Court of Federal Claims	October 2006

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Marcus A. Manos, of the Nexsen Pruet Adams Kleemeier, LLC law firm, which has offices at:

1230 Main Street, Suite 700 (29201), PO Drawer 2426,

Street Address

\_\_\_\_\_, Columbia,

South Carolina.

County City

29202, 803-253-8275.

Zip Code Telephone

If applicable list all other firms/attorneys you are associated with in this matter

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

Yes.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 16<sup>th</sup> day of January, 2008.

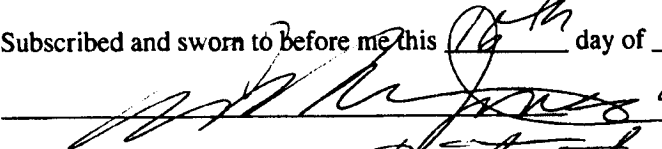
  
APPLICANT

STATE OF District of Columbia VERIFICATION  
COUNTY OF \_\_\_\_\_

I, Justin Mann Ganderson, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 16<sup>th</sup> day of January, 2008

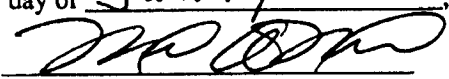
  
Notary Public for the State of District of Columbia

My Commission Expires: My Commission Expires February 14, 2011

#### LOCAL COUNSEL CONSENT

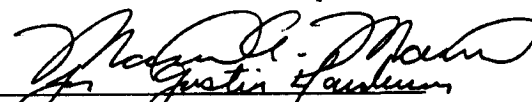
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 23<sup>rd</sup> day of January, 2008

  
LOCAL COUNSEL OF RECORD

#### CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by <sup>hand-delivery</sup> ~~mail~~ addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$100 filing fee payable to the South Carolina Supreme Court on this 24<sup>th</sup> day of January, 2008

  
APPLICANT/AFFIANT

# Supreme Court of Virginia

AT RICHMOND

## Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,  
do hereby certify that

JUSTIN MANN GANDERSON

was admitted to practice as an attorney and counsellor at the bar of this Court on  
October 31, 2005.

I further certify that so far as the records of this office are  
concerned, JUSTIN MANN GANDERSON is a member of the bar of this  
Court in good standing.

Witness my hand and seal of said Court

This 23rd day of January

A.D. 2008

By: Patricia L. Harrington  
Clerk



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SC PUBLIC SERVICE  
COMMISSION

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2007-356-WS

IN RE: )  
)  
Application of Palmetto State Utility )  
Services, Inc. for Certificate of )  
Public Convenience and Necessity )  
)  
)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing MOTION FOR PRO HAC VICE ADMISSION was duly served upon all parties by electronic service and depositing it in the United States Mail, first-class postage prepaid, addressed as follows:

This the 28<sup>th</sup> day of January, 2008.

Shealy Boland Reibold, Esquire  
South Carolina Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, South Carolina 29201

  
NEXSEN PRUET, LLC